



The Commonwealth of Massachusetts

Department of State Police

COMMUNICATIONS SECTION

470 WORCESTER RD, FRAMINGHAM, MA 01702

CHARLES D. BAKER
GOVERNOR

KARYN E. POLITO
LIEUTENANT GOVERNOR

THOMAS A. TURCO, III
SECRETARY

COLONEL KERRY A. GILPIN
SUPERINTENDENT

Via Electronic Comment Filing System

October 22, 2019

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

Re: Notice of *Ex Parte*, PS Docket No. 07-114

Ms. Dortch:

I am the Director of Telecommunications for the Massachusetts State Police. I write to provide an operational perspective on the type of location information needed by 9-1-1 professionals to best carry out our mission to protect and save lives. As some background, my agency operates three (3) regional 9-1-1 PSAPs in rural central and western Massachusetts that serve forty-nine (49) municipalities. These three centers combined process 260,000 9-1-1 calls per year, with approximately 75% of those calls originating from cell phones.

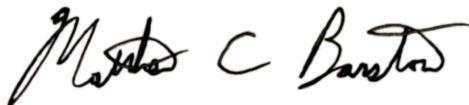
Vertical location information for 9-1-1 callers from inside buildings could improve emergency response. The location information must be actionable, meaning that Public Safety Telecommunicators (PSTs) can quickly use it to assist the caller and direct responders to the scene. A "dispatchable location," as defined by the FCC, remains the gold standard from an operational perspective. However, if wireless carriers are unable to provide a dispatchable location, and instead provide z-axis information, they should be required to make that information as actionable as possible by including an estimated a floor number.

Excellence In Service Through Quality Policing

A raw vertical estimate is of little operational value if it is relative to height above mean sea level (AMSL) or above ground level (AGL). 9-1-1 centers like ours simply do not have the resources to create and maintain indoor maps for buildings in our jurisdictions. Even if we did, we would not have the ability to translate AMSL or AGL to a floor, or visualize a three dimensional point in space. Additionally, the information we receive from wireless carriers should enable us to do better for our law enforcement, fire, and EMS counterparts in the field than providing a height estimate that they then would try to match with their own devices. For example, in the metropolitan Boston area there are several tunnels that route Interstate highways under the city. While the highway is the jurisdiction of the Massachusetts State Police, the buildings directly above the tunnel are the jurisdiction of the City of Boston. Having accurate z-axis information is not only critical for 1st responders on the scene in determining a valid dispatchable location, but in our case it can even determine the actual Agency Having Jurisdiction (AHJ). Because the Commonwealth's NextGen 9-1-1 (NG9-1-1) system geospatially routes every call that is delivered into the system, having accurate z-axis information will ensure proper routing to the AHJ and reduce or eliminate unnecessary call transfers. In order for 9-1-1 professionals to have the information they need to ensure that responders arrive as quickly as possible, they at least need a floor number estimate (e.g.. "4th floor" rather than "12 meters AMSL"). Accordingly, as you contemplate rules for a z-axis metric, please consider requiring wireless carriers to provide a floor number as part of the z-axis information. Requiring wireless carriers to provide actionable location information about 9-1-1 callers will save lives.

Thank you for taking my views into consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Matthew C. Barstow". The signature is fluid and cursive, with the first name "Matthew" being more prominent and the last name "Barstow" following in a similar style.

Matthew C. Barstow, ENP, CPE
Director of Telecommunications
Massachusetts State Police